

Exhibit A

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746(2)**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors¹

PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF No. 23427

UNSWORN DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746(2)

I, Luis R. Emanuelli, of legal age, married, resident of Trujillo Alto, Puerto Rico, under penalty of perjury declares the following:

1. My name and other circumstances are as stated above.
2. I am the Regional Vice President, Puerto Rico Region, of Fresenius Medical Care, North America (“FMC”).
3. FMC is the party in interest in Proof of Claim No. 30574.

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

4. I was the executive in charge of the FMC office when Hurricane Maria struck the Island in 2017 causing severe damage to the building located at 461 Francia Street, San Juan, Puerto Rico 00917.
5. All the paper copies of invoices sent to the Puerto Rico Department of Health (“PRDH”) were water damaged, could not be salvaged, and were discarded.
6. There are no digital backups of these paper invoices.
7. However, all paper invoices were regularly delivered to the PRDH for processing.
8. I have read the foregoing *Response To The Five Hundred Sixty-First Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Deficient Claims (“Response”)*; and
9. The factual assertions in the *Response* are true and correct to the best of my knowledge, information, and belief and/or pursuant to documents in my possession and my personal involvement in the facts of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 27, 2023.



LUIS R. EMANUELLI
Regional Vice President, Puerto Rico Region
Fresenius Medical Care, North America